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8 Attorneys for Plaintiffs

9 TAKEDA PHARMACEUTICAL CO., LTD.,

TAKEDA PHARMACEUTICALS U.S.A., INC.,

10 TAKEDA PHARMACEUTICALS LLC, AND

TAKEDA PHARMACEUTICALS AMERICA,

11 INC.

12 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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14 TAKEDA PHARMACEUTICAL CO., LTD.,
TAKEDA PHARMACEUTICALS U.S.A., INC.,
15 TAKEDA PHARMACEUTICALS LLC, AND
TAKEDA PHARMACEUTICALS AMERICA,
16 INC.,

17 Plaintiffs,

18 v.

19 SANDOZ INC.,

20 Defendant.

Case No. 3:12-cv-00446 JCS

**STIPULATION TO CONTINUANCE OF
INITIAL CASE MANAGEMENT
CONFERENCE; ~~PROPOSED~~ ORDER
THEREON**

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STIPULATION TO CONTINUANCE OF INITIAL
CASE MANAGEMENT CONFERENCE; ~~PROPOSED~~
ORDER THEREON

1 Plaintiffs Takeda Pharmaceutical Company Limited, Takeda Pharmaceuticals U.S.A., Inc.,
2 Takeda Pharmaceuticals LLC, and Takeda Pharmaceuticals America, Inc. (collectively, "Takeda"),
3 and Defendant Sandoz Inc. ("Sandoz") hereby stipulate through their respective attorneys as
4 follows:

5 WHEREAS, on February 27, 2012, the Court issued an Order Setting Case Management
6 Conference in the above-captioned action, scheduling the Initial Case Management Conference for
7 May 4, 2012 at 1:30 p.m.;

8 WHEREAS, Sandoz has informed Takeda that it is seeking new trial counsel;

9 WHEREAS, the parties jointly request a continuance of the Case Management Conference
10 to allow Sandoz sufficient time to obtain new trial counsel;

11 WHEREAS, the parties agree that Friday, June 1, 2012, at 1:30 p.m. is a mutually agreeable
12 date for a rescheduled Initial Case Management Conference; and

13 WHEREAS, the parties further agree that they could meet the deadlines for events leading
14 up to the Initial Case Management Conference in a more orderly fashion if that Conference were
15 postponed until June 1, 2012.

16 NOW THEREFORE, IT IS HEREBY STIPULATED that, subject to the Court's approval,
17 the Initial Case Management Conference shall be held on Friday, June 1, 2012, at 1:30 p.m. and the
18 other dates in the Corrected Order Setting Initial Case Management Conference and ADR
19 Deadlines are continued accordingly.

20 Respectfully Submitted,
21 DATED: April 25, 2012 MUNGER, TOLLES & OLSON LLP

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23 By: /s/ Heather E. Takahashi
24 HEATHER E. TAKAHASHI

25 Attorneys for Plaintiffs
26 TAKEDA PHARMACEUTICAL CO., LTD.,
27 TAKEDA PHARMACEUTICALS U.S.A.,
28 INC., TAKEDA PHARMACEUTICALS LLC,
AND TAKEDA PHARMACEUTICALS
AMERICA, INC.

1 DATED: April 25, 2012

DUANE MORRIS LLP

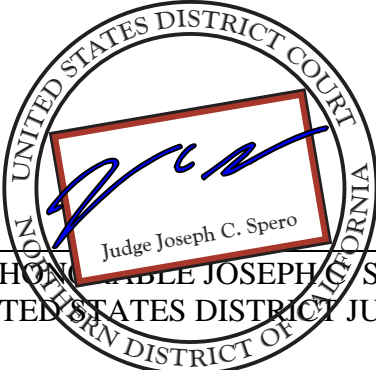
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3 By: /s/ Jessica E. La Londe
4 JESSICA E. LA LONDE

5 Attorneys for Defendant
6 SANDOZ INC.

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8 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

9 DATED: April 26, 2012

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THE HONORABLE JOSEPH C. SPERO
UNITED STATES DISTRICT JUDGE

Filer's Attestation

I, Heather Takahashi, am the ECF user whose identification and password are being used to file this **STIPULATION TO CONTINUANCE OF INITIAL CASE MANAGEMENT CONFERENCE**. In compliance with General Order 45.X.B, I hereby attest that the other above-named signatory concurs in this filing.

DATED: April 25, 2012

/s/ Heather E. Takahashi

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